

Jurisdiction: CUSTER COUNTY, MONTANA

Local Mitigation Plan Review and Approval Status

Jurisdiction: CUSTER COUNTY	Title of Plan: Custer County PDM Plan	Date of Plan: December 2004
Local Point of Contact: Jim Zabrocki	Address: Custer County 1010 Main Street Miles City, MT 59301-3419	
Title: Custer County Disaster Emergency Services Coordinator		
Agency: Custer County		
Phone Number: 406-874-3490	E-Mail: <u>ddes@midrivers.com</u>	

State Reviewer: Larry B. Akers	Title: SHMO	Date: January 12, 2005
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FEMA Reviewer: Wade Nofziger KC Collins Ken Crawford	Title: Mitigation Specialist Mitigation Specialist Mitigation Specialist	Date: June 24, 2005 June 27, 2005 June 28, 2005
Date Received in FEMA Region VIII	April 13, 2005	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	June 28, 2005	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Custer County (mapped 09/01/87)	X			
2. Town of Ismay (not mapped)		X		
3. City of Miles City (mapped 03/22/83)	X			
4.				
5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]				

* Notes:

Y = Participating

N = Not Participating

N/A = Not Mapped

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)

Adoption by the Local Governing Body:
§201.6(c)(5) and §78.5(f)

OR

Multi-Jurisdictional Plan Adoption: §201.6(c)(5)
and §78.5(f) **AND**

Multi-Jurisdictional Planning Participation:
§201.6(a)(3) and §78.5(a)

Planning Process

Documentation of the Planning Process:
§201.6(b) and §201.6(c)(1) and §78.5(a)

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i) and §78.5(b)

Profiling Hazards: §201.6(c)(2)(i) and §78.5(b)

Assessing Vulnerability: Overview:
§201.6(c)(2)(ii) and §78.5(b)

Assessing Vulnerability: Identifying Structures:
§201.6(c)(2)(ii)(A) and §78.5(b)

Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-Jurisdictional Risk Assessment:
§201.6(c)(2)(iii) and FEMA 299

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i) and
§78.5(c)

STAFFORD		FMA	
NOT MET	MET	NOT MET	MET
	N/A		

	X		
	X		

N	S	N	S
	X		

N	S	N	S
	X		
	X		
	X		
N			
N			
N			
	X		

STAFFORD		FMA	
N	S	N	S
	X		

Jurisdiction: CUSTER COUNTY, MONTANA

Identification and Analysis of Mitigation Actions:
§201.6(c)(3)(ii) and §78.5(d)

	X		
	X		
	X		

Implementation of Mitigation Actions:
§201.6(c)(3)(iii) and §78.5(d) and (e)Multi-Jurisdictional Mitigation Actions:
§201.6(c)(3)(iv) and FEMA 299

Plan Maintenance Process

STAFFORDFMA

N

S

N

S

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i) and §78.5(e)

	X		
	X		
	X		

Incorporation into Existing Planning Mechanisms:
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

Additional State Requirements*

STAFFORDFMA

N

S

N

S

Insert State Requirement

Insert State Requirement

Insert State Requirement

LOCAL MITIGATION PLAN APPROVAL STATUS

STAFFORDFMA

PLAN NOT APPROVED

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PLAN APPROVED

XXX	
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*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

See Reviewer's Comments

PREREQUISITE(S)

Adoption by the Local Governing Body

- **Multihazard Requirement §201.6(c)(5):** *[The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Has the local governing body adopted the plan?		N/A				
B. Is supporting documentation, such as a resolution, included?		N/A				
SUMMARY SCORE						

Multi-Jurisdictional Plan Adoption

- **Multihazard Requirement §201.6(c)(5):** *For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Executive Summary	All of the jurisdictions represented in the plan are clearly identified.		X		
B. For each jurisdiction, has the local governing body adopted the plan?	Resolutions	All three jurisdictions adopted the plan.		X		
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Resolutions	All three resolutions are included in the plan.		X		
SUMMARY SCORE				X		

Multi-Jurisdictional Planning Participation

- **Multihazard Requirement §201.6(a)(3):** Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.
- **FMA Requirement §78.5(a):** Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	Pages II 1-4	Much participation was listed in the plan. Three Steering Committee meetings were held in October and November 2004. Minutes from these meetings are provided in Chapter II.		X		
SUMMARY SCORE				X		

PLANNING PROCESS:

Documentation of the Planning Process

- **Multihazard Requirement §201.6(b):** An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:
 - (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;
 - (2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and
 - (3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.
- **Multihazard Requirement §201.6(c)(1):** [The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.
- **FMA Requirement §78.5(a):** Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Page II-1	Well developed and clearly stated process to develop this plan.		X		

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages 1-2, II-2,3,& 4	Very well documented planning process. All participants were identified. The plan did an excellent job of providing information regarding who was involved in the planning process and how. Agendas, meeting minutes, sign-in sheets and a list of Steering Committee membership were provided in the plan.		X		
C. Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Pages 1-2, II-2,3,& 4	The public was invited to participate, and did, throughout the plan process.		X		
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Pages 1-2, II-2,3,& 4	Many different types of agencies and individuals were able to participate in the process. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Pages III 1&2	The plan indicates that Jim Zabrocki, the County Disaster and Emergency Services Coordinator, was the primary contact for the county and provided copies of existing plans, and assisted in data collection. Table 3-1 lists reference s to existing plans and technical information. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		
SUMMARY SCORE				X		

RISK ASSESSMENT: §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

Identifying Hazards

- **Multihazard Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score. Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.	Pages III 1 & 2	A wide range of hazards were identified in the plan, to include: flood, drought, wildfire, tornadoes, winter storms, and others.		X		
SUMMARY SCORE				X		

Profiling Hazards

- **Multihazard Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S

A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages III 5 - 26	<p>All areas throughout the county that had occurrences were identified. The plan provides the location of hazards that impacted the county in a discussion on page iii of the executive summary.</p> <p>Other references available include:</p> <p>It should be noted that www.sheldus.org was cited as a reference that was not consistent with other sources of information reviewed for the plan – see page III-9.</p> <p>FEMA's new Flood Map Modernization site: www.hazards.gov and Map Viewer at: http://hazards.fema.gov/mapviewer/ will track and post development of new digital flood plain mapping in Montana.</p> <p>The report did a great job of identifying bridges in Custer County. This information enhanced the plan. 2002 HAZUS data indicates that one bridge in Custer County has a critical scour rating. The bridge is located on Frontage Road 205. Including this information would enhance the plan.</p> <p>The plan does a good job of indicating that there are no high hazard dams in the county, but four significant hazard dams – on page III-7. HAZUS data confirms that there are no high hazard dams in Custer County.</p>		X		
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages III 5 - 26	The extent of hazards was assessed and results of the assessment are provided in Table 3.2. Extent is covered in terms of the potential consequences. The Steering Committee assessed previous events to rank hazards for probability and consequences in Table 3.2.		X		
C. Does the plan provide information on previous occurrences of each hazard addressed in the plan?	Pages III 5 - 26	They have a very good historical accounting, where available, of the hazards. A lot of research was conducted on this.		X		
D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?	Pages III 5 - 26	The probability of future events is highlighted in table 3-2 under the probability column as low, medium, and high.		X		
SUMMARY SCORE				X		

Assessing Vulnerability: Overview

- **Multihazard Requirement §201.6(c)(2)(ii):** *[The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Pages III 5 - 26	Vulnerability is well defined throughout the document.		X		
B. Does the plan address the impact of each hazard on the jurisdiction?	Pages III 5 - 26	Impacts are well documented. A brief description of how each hazard type varies between jurisdictions (mainly flooding) is provided in the plan.		X		
SUMMARY SCORE				X		

Assessing Vulnerability: Identifying Structures

- **Multihazard Requirement §201.6(c)(2)(ii)(A):** *The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties,*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings (including repetitive loss structures) , infrastructure, and critical facilities located in the identified hazard areas?	Pages III 18 - 26	The plan provides a lot of detail regarding vulnerability to various structures, infrastructure, and critical facilities. Critical and essential existing facilities for each city and town in Custer County are provided in the plan in Table 3.6 on page III-16. However, buildings are not identified as being within hazard prone areas. The plan does state, though, on page III-8 that low-lying areas outside of Miles City throughout the county are vulnerable to flooding and that low-lying areas are also where much of the human built assets are	X			

		located. In order to receive a satisfactory rating for this section, critical facilities would need to be identified for each hazard event type. <i>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.</i>				
B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages 1 1 & 2	In general the plan does not describe vulnerability of future buildings, infrastructure and critical facilities within the hazard prone areas. However the plan does state on page I-2 under development trends, with the exception of the occasional residence/trailer – all new construction is occurring outside of the 100-year floodplain. In order to receive a satisfactory rating for this section, the vulnerability of future buildings for each hazard type needs to be provided. <i>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</i>	X			
SUMMARY SCORE			X			

Assessing Vulnerability: Estimating Potential Losses

- **Multihazard Requirement §201.6(c)(2)(ii)(B):** *[The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	Pages III 21-26	<p>The plan provides a fairly good detail of potential losses, by hazard. Potential dollar losses for floods and drought are provided in the plan. Estimates from the Montana Dept. of Revenue were used in the various estimates calculated. The plan discussed both direct and indirect/induced losses. Since these two disaster types have the most potential to inflict damage on the county, cost estimates for losses were done only for these two hazard event types. However, a discussion of potential losses for each hazard type assessed was included in the plan.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p>		X		
B. Does the plan describe the methodology used to prepare the estimate?	Page III 21	<p>The methodology used to calculate these estimates is based on figures provided by the Montana Dept. of Revenue. Methodologies for each hazard type were explained and described for flood and drought estimates. More identification of exposure and analysis of various hazards and their effects can be accomplished to further enhance the plan.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</p>		X		
SUMMARY SCORE				X		

Assessing Vulnerability: Analyzing Development Trends

- **Multihazard Requirement §201.6(c)(2)(ii)(C):** *[The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe land uses and development trends?	Pages 1 2 & 3	<p>Land use and development trends are discussed on page 1-2 and explains that new construction, except for the occasional trailer and residence, is kept out of the 100-year floodplain, Miles City has experienced growth on the southern and eastern ends, and that overall land use in the county is relatively stable.</p> <p><u>SUGGESTION:</u></p> <p>Custer County is preparing a "Growth Policy", and reference to this plan should be incorporated and be part and parcel to that planning mechanism. More discussion and analysis of how and where local development is happening within Miles City, and other jurisdictions, and how zoning or enforcement regulations and codes might enhance mitigation within those jurisdictions, should be addressed in relation to this plan.</p> <p><i>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</i></p>		X		
SUMMARY SCORE				X		

Multi-Jurisdictional Risk Assessment

- **Multihazard Requirement §201.6(c)(2)(iii):** *For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			STAFFORD	FMA

annex and page #)			N	S	N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Page iii	The plan specifies that all jurisdictions within the county were assessed for all risks. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		
SUMMARY SCORE				X		

MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.*

Local Hazard Mitigation Goals

- **Multihazard Requirement §201.6(c)(3)(i):** *[The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*
- **FMA Requirement §78.5(c):** *The applicant's floodplain management goals for the area covered by the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.)	Pages IV 1-7	Very extensive goal structure, with seven major goals identified.		X		
SUMMARY SCORE				X		

Identification and Analysis of Mitigation Actions

- **Multihazard Requirement §201.6(c)(3)(ii):** *[The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.*
- **FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered.*

Element	Location in the Plan (section or	Reviewer's Comments	SCORE			
			STAFFORD		FMA	

annex and page #)			N	S	N	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Pages IV 1-13	Nicely done. They've identified a wide range of mitigation activities, all associated with specific hazards.		X		
B. Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Pages IV 1-13	Mitigation actions are identified per hazard, and are generally countywide, except for the proposal to ensure long-term integrity of the Miles City dike. This action would protect both future and existing buildings and infrastructure from flood damage. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Pages IV 1-13	The wide variety of proposed projects should reduce the effects of hazards on many different buildings and structures throughout the county.		X		
SUMMARY SCORE				X		

Implementation of Mitigation Actions

- **Multihazard Requirement: §201.6(c)(3)(iii):** *[The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.*
- **FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered; and*
- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Pages IV 8-11	Chapter IV of the plan discusses the prioritization process for the PMD projects listed in Table 4.1. Priority ranking is high, medium or low. Note: For Goal 7 - that came from the draft Community Fire Plan; it has a ranking that indicates timeframe of years. This is inconsistent and should be modified to include both timeframes and priority for all mitigation actions proposed in the plan.		X		

		<i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>				
B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Pages IV 8-11	The plan lays out who will do the project and the general timeframe in which to do it.		X		
B.1. Does the mitigation strategy address continued compliance with the NFIP?	Pages IV 8-11	Compliance with NFIP is a specific identified mitigation action. <i>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.</i>				X
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	Page IV 12	Benefits to cost will be specific criteria for funding of future projects. <i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>		X		
C.1. Does the mitigation strategy emphasize cost-effective and technically feasible mitigation actions?	Page IV 12	See above. <i>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.</i>				X
SUMMARY SCORE				X		X

Multi-Jurisdictional Mitigation Actions

- **Multihazard Requirement §201.6(c)(3)(iv):** *For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	Pages IV 8-11	Most of the actions cover all jurisdictions within the county. Although not identified specifically enough to actually meet the technical aspects of the criteria, it is assumed that the broad list of projects apply to all jurisdictions equally. Those specific to a particular jurisdiction are identified, and should be enhanced to include all participating jurisdictions.		X		
SUMMARY SCORE				X		

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

- **Multihazard Requirement §201.6(c)(4)(i):** *[The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.*
- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Page V-1	The plan will be reviewed each year, or after a major disaster, and updated as necessary. Every five years, it will have the major update.		X		
B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	Page V-1	The DES Coordinator and LEPC chair have the responsibility for evaluating the plan.		X		

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C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?	Page V-1	The plan will be evaluated at least every year. <i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>		X		
SUMMARY SCORE				X		

Incorporation into Existing Planning Mechanisms

- Multihazard Requirement §201.6(c)(4)(ii):** *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Page V-2	There are several plans that will be associated with this plan. These include the County Community Fire Plan (in work), the County Growth Policy (in work), and the Miles City Comprehensive Plan. <i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>		X		
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Page V-2	The county is in the process of hiring a planner to coordinate and work various planning initiatives. <i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i>		X		
SUMMARY SCORE				X		

Continued Public Involvement

- Multihazard Requirement §201.6(c)(4)(iii):** *[The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan explain how continued public	Page V-2	The plan states that the public will be given notice in		X		

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<p>participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)</p>		<p>various venues to encourage participation in the process.</p> <p><i>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</i></p>				
SUMMARY SCORE				X		